

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

## **COMPLAINT**

Plaintiff RFID Technology Innovations, LLC (“Plaintiff” or “RFID”) files this Complaint against Zoho Corporation (“Defendant” or “Zoho”) for infringement of United States Patent No. 9,582,689 (the “‘689 Patent”).

## **PARTIES AND JURISDICTION**

1. This is an action for patent infringement under Title 35 of the United States Code. Plaintiff is seeking injunctive relief as well as damages.

2. Jurisdiction is proper in this Court pursuant to 28 U.S.C. §§ 1331 (Federal Question) and 1338(a) (Patents) because this is a civil action for patent infringement arising under the United States patent statutes.

3. Plaintiff is a Texas limited liability company with a place of business at 1801 NE 123 Street, Suite 314, Miami, FL 33181.

4. On information and belief, Defendant is a California corporation with a place of business at 6800 Burleson Rd., Building 310, Suite 200, Austin, TX 78744. On information and belief, Defendant may be served through its agent, Sridhar Vembu, 4141 Hacienda Drive,

Pleasanton, CA 94588.

5. This Court has personal jurisdiction over Defendant because Defendant has committed, and continues to commit, acts of infringement in this District, has conducted business in this District, and/or has engaged in continuous and systematic activities in this District.

6. Upon information and belief, Defendant's instrumentalities that are alleged herein to infringe were and continue to be used, imported, offered for sale, and/or sold in this District.

#### VENUE

7. On information and belief, venue is proper in this District under 28 U.S.C. § 1400(b) because Defendant is deemed to be a resident of this District. Alternatively, acts of infringement are occurring in this District and Defendant has a regular and established place of business in this District.

#### COUNT I (INFRINGEMENT OF UNITED STATES PATENT NO. 9,582,689)

8. Plaintiff incorporates paragraphs 1 through 7 herein by reference.

9. This cause of action arises under the patent laws of the United States and, in particular, under 35 U.S.C. §§ 271, *et seq.*

10. Plaintiff is the owner by assignment of the '689 Patent with sole rights to enforce the '689 Patent and sue infringers.

11. A copy of the '689 Patent, titled "System and method for presenting information about an object on a portable electronic device," is attached hereto as Exhibit A.

12. The '689 Patent is valid, enforceable, and was duly issued in full compliance with Title 35 of the United States Code.

13. Upon information and belief, at least through internal testing, Defendant has infringed and continues to infringe one or more claims, including at least Claim 16 of the ‘689 Patent by using and/or incorporating scanning technology and scanning software which may run on a mobile device. Defendant’s products and services enable a user to scan symbology associated with assets in order to track the assets. Defendant’s products and services are made, used, sold, and/or distributed by and/or controlled by Defendant in a manner covered by one or more claims of the ‘689 Patent. Defendant has infringed and continues to infringe the ‘689 Patent in violation of 35 U.S.C. § 271.

14. Regarding Claim 16, at least through internal use and testing, Defendant provides an asset tracking product called “Zoho” or “Zoho Inventory,” and any similar goods or services (“Product”), which perform methods for tracking and managing inventory assets utilizing barcode/symbology scanning. Certain aspects of this element are illustrated in the screenshots below.

## Access Zoho Inventory



Welcome to Zoho Inventory, an online cloud based application which helps you manage your organization's inventory with ease. This page will guide you through the process of creating an account, setting up your organization and also get you acquainted with the app.

Source: <https://www.zoho.com/us/inventory/help/>

## Breathe new life into your business with barcode inventory management

All businesses, whether big or small, require smart management. Introduce barcode-based inventory management to improve your accuracy and efficiency, streamline your fulfillment process, and free up more time.

Source: <https://www.zoho.com/us/inventory/barcode-software-small-businesses/>

15. The Product includes a system having a server. For example, a user can track

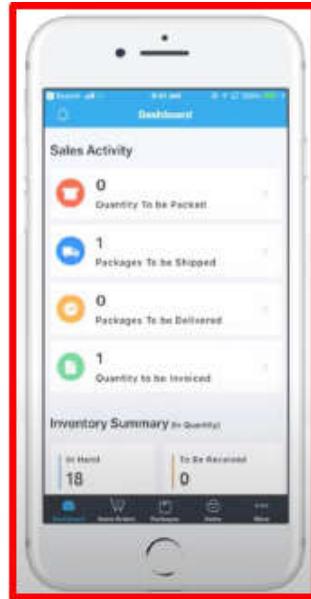
assets by scanning symbology through the system's barcode scanning application. The barcode scanning application receives the inventory details through a cloud server and transmits those details to the user's portable device (e.g., mobile device on which the system's barcode scanning application is running). Certain aspects of this element are illustrated in the screenshots below and/or in screenshots provided in connection with other allegations herein.

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16. The system is in communication with a portable electronic device. For example, the Product's barcode inventory system provides an application which can be installed on a portable device that the system can communicate with the portable electronic device through the cloud. Certain aspects of this element are illustrated in the screenshots below and/or screenshots referenced in other paragraphs herein.

## Barcode scanning in Zoho Inventory iOS app



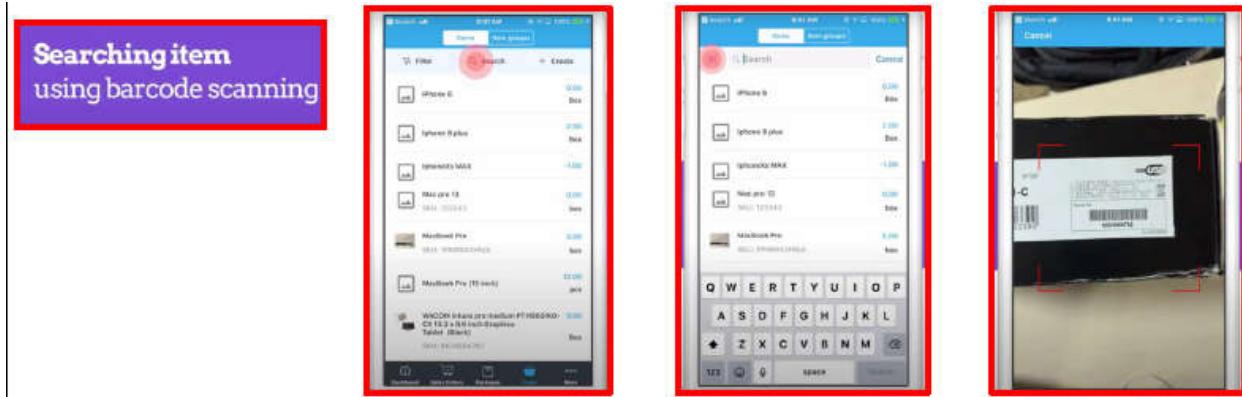
Source: <https://www.zoho.com/us/inventory/barcode-software-small-businesses/>

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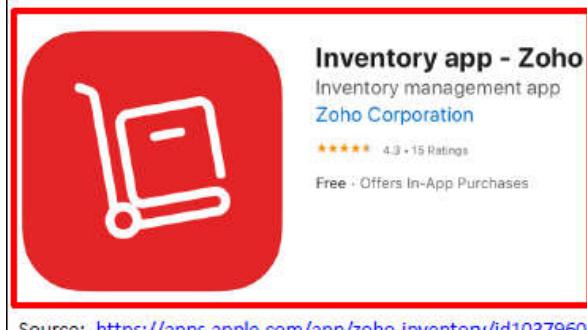
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17. The system is configured to capture a digital image using a digital image capturing device that is part of the portable electronic device. For example, the user can capture a digital image of a barcode by a camera which is the part of the mobile device. Certain aspects of this element are illustrated in the screenshots below and/or screenshots referenced in other paragraphs herein.



Source: <https://www.zoho.com/us/inventory/barcode-software-small-businesses/>



Source: <https://apps.apple.com/app/zoho-inventory/id1037960494>

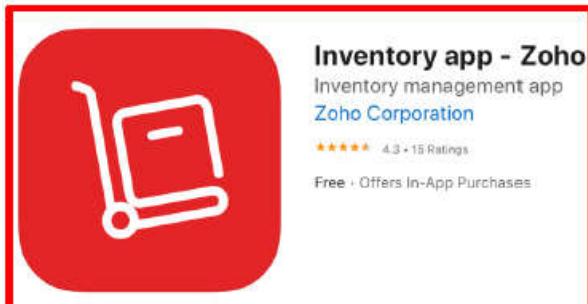
18. The system detects symbology associated with the captured digital image. For example, after capturing the digital image, the image capturing device and/or software associated with or running on the device, detects the symbology associated with the captured digital image of the barcode. Certain aspects of this element are illustrated in the screenshots below and/or those referenced in other paragraphs herein.

#### Features we offer

- Manage stock in multiple warehouses.
- Add your products and services with a few taps.
- Scan barcodes using your phone camera.
- Track your stock by its serial or batch number.



Source: <https://www.zoho.com/us/inventory/barcode-software-small-businesses/>

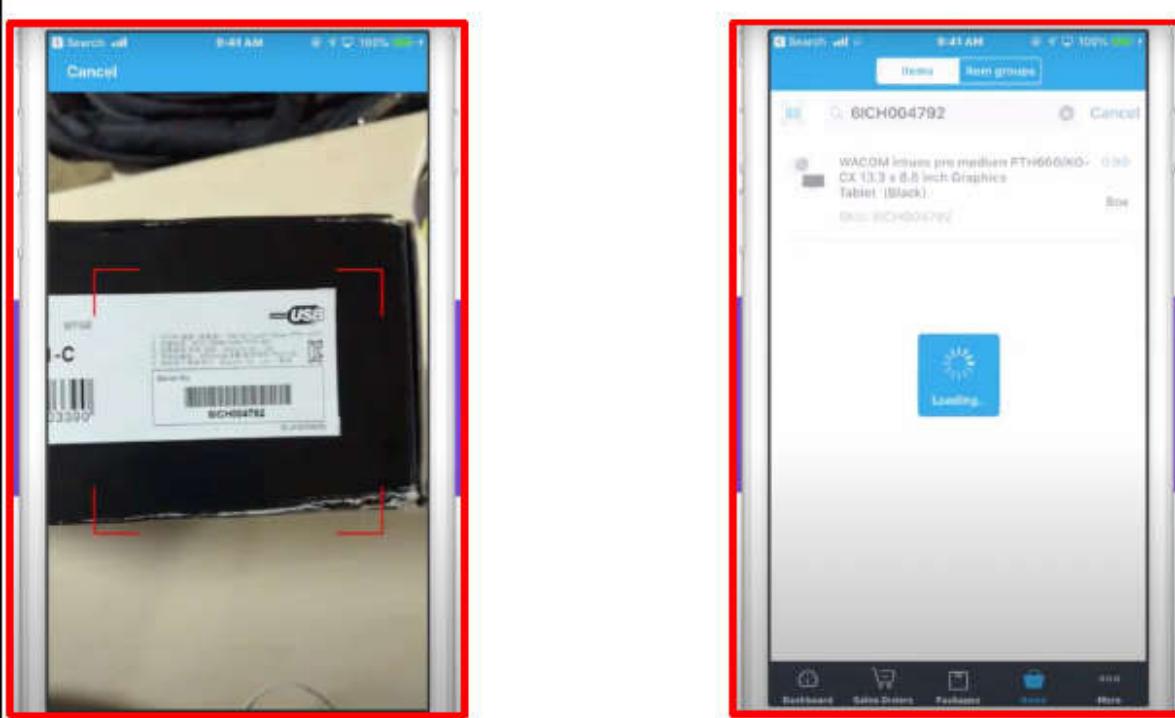


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Source: <https://apps.apple.com/app/zoho-inventory/id1037960494>

19. The system decodes the symbology to obtain a decode string using one or more visual detection applications. For example, the system's software (i.e., visual detection application) decodes the symbology of the barcode to obtain a decode string (e.g., a link for retrieving asset details associated with the detected barcode). Certain aspects of this element are illustrated in the screenshots below and/or those referenced in other paragraphs herein.



Source: <https://www.zoho.com/us/inventory/barcode-software-small-businesses/>

20. The Product provides for communication with the at least one server. For example, the system's application software communicates to the cloud server (i.e., server) for processing and retrieving information associated with scanned barcode. Certain aspects of this element are illustrated in the screenshots below and/or those referenced in other paragraphs herein.

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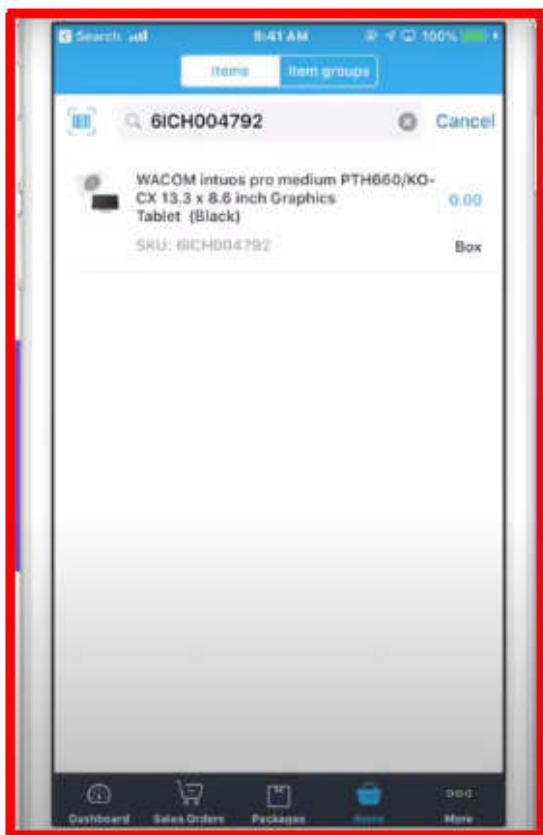
Source: <https://www.zoho.com/us/inventory/help/>

## Mobile Apps

Want to access Zoho Inventory on your smartphone? We have the app for your iOS and Android devices. Know more about the Zoho Inventory [mobile apps](#).

Source: <https://www.zoho.com/us/inventory/help/getting-started/sign-up.html>

21. The system displays the information on a display device associated with the portable electronic device. For example, the user can see the information associated with the scanned barcode on the display of the portable electronic device (i.e., display screen of the mobile device). Certain aspects of this element are illustrated in the screenshots below and/or those referenced in other paragraphs herein.



Source: <https://www.zoho.com/us/inventory/barcode-software-small-businesses/>

22. Defendant's actions complained of herein will continue unless Defendant is enjoined by this court.

23. Defendant's actions complained of herein are causing irreparable harm and monetary damage to Plaintiff and will continue to do so unless and until Defendant is enjoined and restrained by this Court.

24. Plaintiff is in compliance with 35 U.S.C. § 287.

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiff asks the Court to:

- (a) Enter judgment for Plaintiff on this Complaint on all causes of action asserted herein;
- (b) Enter an Order enjoining Defendant, its agents, officers, servants, employees, attorneys, and all persons in active concert or participation with Defendant who receive notice of the order from further infringement of United States Patent No. 9,582,689 (or, in the alternative, awarding Plaintiff running royalties from the time of judgment going forward);
- (c) Award Plaintiff damages resulting from Defendant's infringement in accordance with 35 U.S.C. § 284;
- (d) Award Plaintiff pre-judgment and post-judgment interest and costs; and
- (e) Award Plaintiff such further relief to which the Court finds Plaintiff entitled under law or equity.

Dated: October 15, 2020

Respectfully submitted,

*/s/ Jay Johnson*  
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